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Attorneys for Plaintiffs Ian Green, Leo  
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and Proposed Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VICTOR BAO, Derivatively on Behalf of  
ALPHABET INC.,

Plaintiff,

v.

LAWRENCE E. PAGE, SUNDAR PICHAI,  
RUTH M. PORAT, SERGEY BRIN, ERIC E.  
SCHMIDT, L. JOHN DOERR, ROGER W.  
FERGUSON, JR., DIANE B. GREENE,  
JOHN L. HENNESSY, ANN MATHER,  
ALAN R. MULALLY, and K. RAM  
SCHRIRAM,

Defendants,

-and-

ALPHABET INC.,

Nominal Defendant.

) Case No. 4:19-cv-00314-JSW

)  
)  
) REPLY IN SUPPORT OF MOTION TO  
) APPOINT ROBBINS ARROYO LLP AS  
) LEAD COUNSEL IN DERIVATIVE  
) ACTIONS

)  
)  
) Date Action Filed: January 18, 2019  
) Judge: Hon. Jeffrey S. White  
) Courtroom: 5  
) Hearing Date: November 15, 2019  
) Hearing Time: 9:00 a.m.

[Caption continued on next page.]

DANIEL CORDEIRO, Derivatively on Behalf  
of ALPHABET INC.,

Plaintiff,

v.

LAWRENCE E. PAGE, SUNDAR PICHAI,  
RUTH M. PORAT, SERGEY BRIN, ERIC E.  
SCHMIDT, L. JOHN DOERR, ROGER W.  
FERGUSON, JR., DIANE B. GREENE, JOHN  
L. HENNESSY, ANN MATHER, ALAN R.  
MULALLY, and K. RAM SCHRIRAM,

Defendants,

-and-

ALPHABET INC.,

Nominal Defendant.

Case No. 4:19-cv-00447-JSW

Date Action Filed: January 25, 2019  
Judge: Hon. Jeffrey S. White

SCOTT GALBIATI, Derivatively on Behalf of  
ALPHABET INC.,

Plaintiff,

v.

LARRY PAGE, SERGEY BRIN, ERIC E.  
SCHMIDT, L. JOHN DOERR, ROGER W.  
FERGUSON, JR., DIANE B. GREENE,  
JOHN L. HENNESSY, ANN MATHER,  
ALAN R. MULALLY, SUNDAR PICHAI,  
and K. RAM SHRIRAM,

Defendants,

-and-

ALPHABET INC., a Delaware corporation,

Nominal Defendant.

Case No. 4:19-cv-01063-JSW

Date Action Filed: February 26, 2019  
Judge: Jeffrey S. White

[Caption continued on next page.]

IAN GREEN, LEO SHUMACHER, and  
STEVE SIMS, Derivatively on Behalf of  
ALPHABET INC.,

Plaintiffs,

v.

LARRY PAGE, SERGEY BRIN, SUNDAR  
PICHAI, DAVID C. DRUMMOND, DIANE  
B. GREENE, ERIC E. SCHMIDT, RUTH M.  
PORAT, JOHN L. HENNESSY, K. RAM  
SHRIRAM, L. JOHN DOERR, ANN  
MATHER, ALAN R. MULALLY, ROGER  
W. FERGUSON, JR, SHIRLEY M.  
TILGHMAN, ANDREW E. RUBIN, and  
AMIT SINGHAL,

Defendants,

-and-

ALPHABET INC., a Delaware Corporation,

Nominal Defendant.

Case No. 4:19-cv-01165-JSW

Date Action Filed: March 1, 2019  
Judge: Hon. Jeffrey S. White

JOSEPH LIPOVICH, Derivatively on Behalf  
of ALPHABET INC.,

Plaintiff,

v.

LARRY PAGE, SERGEY BRIN, SUNDAR  
PICHAI, DAVID C. DRUMMOND, DIANE  
B. GREENE, ERIC E. SCHMIDT, RUTH M.  
PORAT, JOHN L. HENNESSY, K. RAM  
SHRIRAM, L. JOHN DOERR, ANN  
MATHER, ALAN R. MULALLY, ROGER  
W. FERGUSON, JR, SHIRLEY M.  
TILGHMAN, ANDREW E. RUBIN, and  
AMIT SINGHAL,

Defendants,

-and-

ALPHABET INC., a Delaware Corporation,

Nominal Defendant.

Case No. 4:19-cv-01295-JSW

Date Action Filed: March 11, 2019  
Judge: Hon. Jeffrey S. White

Moving Plaintiffs Ian Green, Leo Shumacher, Steve Sims, and Joseph Lipovich, the named plaintiffs in two of the related shareholder derivative actions filed on behalf of Alphabet Inc. ("Alphabet") in this Court, respectfully submit this reply in support of their Motion to Appoint Robbins Arroyo LLP as Lead Counsel in Derivative Actions (the "Motion").<sup>1</sup>

As discussed in the Moving Plaintiffs' opening brief, the appointment of Robbins LLP ("Robbins")<sup>2</sup> as Lead Counsel in this litigation is appropriate given the firm's qualifications to lead the prosecution of the derivative claims, its desire and ability to pursue this litigation in the Company's and its stockholders' best interests, its efforts in this litigation to date, and its willingness and ability to commit the resources necessary to fully prosecute the derivative claims. Motion at 3-9. All of the Plaintiffs in the Related Derivative Actions agree that Robbins should be appointed Lead Counsel.<sup>3</sup> Declaration of Shane P. Sanders in Support of Motion to Appoint Robbins Arroyo LLP as Lead Counsel in Derivative Actions, ¶3.

The only opposition papers were filed by the Alphabet Defendants.<sup>4</sup> The Alphabet Defendants, however, do not have any substantive opposition or objection to the appointment of Robbins as Lead Counsel. Alphabet Defendants' Opposition to Motion to Appoint Robbins Arroyo as Lead Counsel in Derivative Actions ("Opp.") at 3 ("[T]he Alphabet Defendants take no position on which firm should serve as lead ..."). Rather, the Alphabet Defendants merely argue that the appointment of Lead Counsel is "premature" because the Alphabet Defendants have requested a stay and the Court has not yet entered an

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<sup>1</sup> Moving Plaintiffs have conferred with counsel for the Alphabet Defendants (as defined in footnote 4) and, unless the Court wishes to hear oral argument on this Motion, the parties are amenable to the Court vacating the hearing currently scheduled for November 15, 2019 and ruling on the papers that have been submitted by the parties.

<sup>2</sup> As of October 30, 2019, the law firm of Robbins Arroyo LLP is now known as Robbins LLP. A Notice of Firm Name Change is filed concurrently herewith.

<sup>3</sup> "Plaintiffs" refers collectively to the Moving Plaintiffs and plaintiffs Victor Bao, Daniel Cordeiro, and Scott Galbiati.

<sup>4</sup> "Alphabet Defendants" refers to nominal defendant Alphabet and individual defendants Lawrence E. Page, Sundar Pichai, Ruth M. Porat, Sergey Brin, Eric E. Schmidt, L. John Doerr, Roger W. Ferguson Jr., Diane B. Greene, John L. Hennessy, Ann Mather, Alan R. Mulally, K. Ram Schriram, David C. Drummond, and Shirley M. Tilghman. Neither defendant Andrew E. Rubin nor Amit Singhal filed an opposition or response to the Motion.

order consolidating the Related Derivative Actions. Opp. at 1, 3. But the mere fact that the Alphabet Defendants want the Related Derivative Actions stayed in no way precludes the parties and the Court from organizing the cases to ensure the orderly and efficient litigation of the derivative claims moving forward. The Alphabet Defendants do not, because they cannot, cite a single case suggesting that motions for consolidation and/or for the appointment of lead counsel are improper – or otherwise should not be granted – simply because defendants would like the litigation to be stayed.

For the reasons stated herein and in their opening brief, Moving Plaintiffs respectfully request that the Court grant their Motion and appoint Robbins as Lead Counsel.

Dated: November 1, 2019

Respectfully submitted,

ROBBINS LLP

/s/ Shane P. Sanders

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*Counsel for Plaintiffs Ian Green, Leo Shumacher, Steve Sims, and Joseph Lipovich and [Proposed] Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2019, a copy of the foregoing Reply in Support of Motion to Appoint Robbins Arroyo LLP As Lead Counsel In Derivative Actions was electronically filed with the Clerk of Court in the following actions:

***Lipovich v. Page, et al., Case No. 4:19-cv-01295-JSW***

***Green, et al. v. Page, et al., Case No. 4:19-cv-01165-JSW***

***Bao v. Page, et al., Case No. 4:19-cv-00314-JSW***

***Cordeiro v. Page, et al., Case No. 4:19-cv-00447-JSW***

***Galbiati v. Page, et al., Case No. 4:19-cv-01063-JSW***

Notice of this filing will be sent via e-mail to all parties, in each action, by operation of the Court's electronic filing system or by U.S. Mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

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/s/ Shane P. Sanders  
SHANE P. SANDERS